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*Counsel to the Official Committee of  
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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	)	Case No. 20-12345 (SCC)
	)	
THE ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, NEW YORK,	)	Chapter 11
	)	
Debtor.	)	
<hr style="border: 0.5px solid black;"/>		
THE ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, NEW YORK,	)	Adv. No. 20-01226 (SCC)
	)	
Plaintiff,	)	
v.	)	
ARK320 DOE, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**NOTICE OF PRESENTMENT OF SCHEDULING ORDER WITH RESPECT TO  
DEBTOR'S MOTION FOR PRELIMINARY INJUNCTION**

Please take notice that the parties to the *[PROPOSED] STIPULATED SCHEDULING  
ORDER WITH RESPECT TO DEBTOR'S MOTION FOR PRELIMINARY INJUNCTION UNDER*

*SECTIONS 362 AND 105(a) OF THE BANKRUPTCY CODE* (the “Stipulation”) hereby provide notice of presentment of the Stipulation, which is annexed hereto,<sup>1</sup> as set forth below.

**PLEASE TAKE FURTHER NOTICE THAT** the Official Committee of Unsecured Creditors appointed in the above-captioned case (the “Committee”), by and through its undersigned counsel, will present the attached Stipulation, agreed to between the Committee and the Plaintiff, The Roman Catholic Diocese of Rockville Centre, New York, to the Honorable Martin Glenn, United States Bankruptcy Judge, at the United States Bankruptcy Court of the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, on **September 8, 2022 at 12:00 pm (prevailing Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections (each, an “Objection”) to the Stipulation shall be in writing, shall confirm to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall set forth the basis for the Objection and the specific grounds therefor, and shall be filed with the Court electronically in accordance with General Order M-399 by registered users of the Court’s case filing system (the User’s Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Court), and served so as to be actually received no later than **September 8, 2022 at 11:00 a.m. (prevailing Eastern Time)** (the “Objection Deadline”).

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<sup>1</sup> It should be noted that for purposes of the Stipulation, the Parties have agreed to certain facts relating to insurance coverage. Those facts are set forth in a chart to be attached to the Stipulation, and subject to the qualifications stated therein. Because that chart necessarily contains confidential information about individual proofs of claim and associated state court complaints, the Parties will promptly separately file a copy of the stipulated chart and associated sealing request with the Court.

**PLEASE TAKE FURTHER NOTICE** that if an Objection is not filed and served by the Objection Deadline in accordance with the preceding paragraph, there will not be a hearing and the Stipulation may be signed.

**PLEASE TAKE FURTHER NOTICE** that if an Objection is timely filed and served, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: August 31, 2022

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Karen B. Dine

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*Counsel to the Official Committee of Unsecured  
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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE ROMAN CATHOLIC DIOCESE OF  
ROCKVILLE CENTRE, NEW YORK,<sup>1</sup>  
Debtor.

Chapter 11

Case No. 20-12345 (MG)

THE ROMAN CATHOLIC DIOCESE OF  
ROCKVILLE CENTRE, NEW YORK,

Plaintiff,

Adv. Pro. No. 20-01226

v.

Ark320 Doe, et al.,<sup>2</sup>

Defendants.

**[PROPOSED] STIPULATED SCHEDULING ORDER WITH RESPECT TO DEBTOR'S  
MOTION FOR PRELIMINARY INJUNCTION UNDER SECTIONS 362 AND 105(a) OF  
THE BANKRUPTCY CODE**

The Court, having considered the joint request of The Roman Catholic Diocese of Rockville Centre, New York, (the “Debtor”), on the one hand, and the Official Committee of Unsecured Creditors (“Committee” and together with the Debtor, the “Parties”), on the other hand, to enter the scheduling order reflected herein with respect to the *Debtor’s Motion for Preliminary Injunction Under Sections 362 and 105(a) of the Bankruptcy Code* [Docket No. 126] (the “Motion”); and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, the Court finds that good and sufficient cause exists to enter this Scheduling Order. Therefore, it is hereby **ORDERED**:

<sup>1</sup> The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is P.O. Box 9023, Rockville Centre, NY 11571-9023.

<sup>2</sup> A full list of the Defendants in this adversary proceeding is included in Exhibit A to the Verified Complaint for Declaratory and Injunctive Relief [Adv. Pro. Docket No. 1].

1. An evidentiary hearing on the Motion is set for **October 24, 25, 26 and 27 2022 starting at 9:00 a.m. (Eastern Time)**. Unless the Court determines otherwise, the hearing will be conducted as a hybrid hearing and the parties and witnesses may appear in person or by Zoom.
2. Requests for written discovery shall be served on or before **August 31, 2022** unless otherwise agreed in writing by the Parties.
3. Responses and/or objections to discovery requests shall be served on or before **September 12, 2022**, unless otherwise agreed in writing by the Parties.
4. All responsive, non-privileged documents shall be produced on or before **September 12, 2022**, unless otherwise agreed in writing by the Parties.
5. Parties shall identify the fact witness they intend to call at the hearing on or before **September 12, 2022**.
6. A joint status conference statement shall be filed by on **September 19, 2022**.
7. The Court shall hold a status conference on **September 21, 2022 at 2 p.m. (Eastern Time)**.
8. Depositions of fact witnesses shall be scheduled and concluded on or before **September 30, 2022**, unless otherwise agreed in writing by the Parties.
9. The Parties agree that neither evidence of claim values, nor expert testimony shall be introduced at the hearing.
10. The Committee's Opposition to the Debtor's Motion shall be filed on or before **October 7, 2022**, unless otherwise agreed in writing by the Parties.
11. The Debtor's Reply shall be filed on or before **October 19, 2022**, unless otherwise agreed in writing by the Parties.

12. Declarations setting forth the direct testimony of witnesses and all referenced exhibits will be filed on the docket and served on or before **October 21, 2022**, unless otherwise agreed in writing by the Parties. For avoidance of doubt, a declaration must be filed for any witness offering direct testimony whether or not that witness has submitted a prior declaration in support of or in opposition to the Motion.

13. Any pre-hearing motions, including motions *in limine* shall be filed by **October 21, 2022**.

14. Unless otherwise stated, all deadlines set forth above are effective as of **5:00 p.m. (Eastern Time)** on each applicable date.

15. For purposes of the Motion, the Parties have agreed to the facts relating to insurance coverage. Those facts are set forth in a chart, and subject to the qualifications stated therein. Because that chart necessarily contains confidential information about individual proofs of claim and associated state court complaints, the Parties will promptly file a copy of the stipulated chart and associated sealing request with the Court.

16. This Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

**### END OF ORDER ###**

Submitted by:

/s/ Karen B. Dine

Karen B. Dine

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**Approved by:**

By: /s/ Eric P. Stephens

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By: /s/ Kenneth H. Brown

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